

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARY HEUSSER, formerly known as MARY)	
COTTER, and PEOPLE OF THE STATE OF)	
ILLINOIS ex rel. MARY HEUSSER,)	
)	
Plaintiffs,)	Case No.: 1:15-cv-01692
)	Judge Kennelly
)	
vs.)	
)	
ADVANCED CAPITAL SOLUTIONS, INC.,)	
)	
Defendant.)	

MOTION TO DISMISS THIRD PARTY CITATION TO DISCOVER ASSETS

Plaintiff, Mary Heusser, (“Plaintiff”), moves this Court to dismiss the Third Party Citation to Discover Assets for MB Financial Bank and in support thereof state as follows:

1. On May 21, 2015, this Court entered a judgment against Defendant, Advanced Capital Solutions, Inc. in the amount of \$1,000.00 in statutory damages, \$3000.00 in compensatory damages, and \$7031.58 in attorney fees and costs.
2. On May 28th, 2015 this Court issued a Third Party Citation to Discover Assets to MB Financial Bank.
3. On June 2, 2015, MB Financial Bank received the citation to discover assets and sent out a response by mail on June 3, 2015.
4. Plaintiff's counsel received the response on June 8, 2015, which indicated that MB Financial Bank had no record on file regarding any account held by the Defendant.

WHEREFORE, Plaintiff respectfully requests that the Third Party Citation to Discover Assets be

dismissed.

Respectfully submitted,

s/ Tara L. Goodwin
Tara L. Goodwin

Tara L. Goodwin
Daniel A. Edelman
EDELMAN, COMBS, LATTURNER
& GOODWIN, LLC
20 S. Clark St., Ste. 1500
Chicago, IL 60603
Attorneys for Plaintiffs